



DEPARTMENT OF NATURAL RESOURCES

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Mr. Charles Dill
Donaldson Company, Inc.
400 Donaldson Drive
Chillicothe, MO 64601

Re: Donaldson Company, Inc., 117-0012
Permit Number: **OP2006-023**

Dear Mr. Dill:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Original signed by Michael J. Stansfield, P.E.

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:casl

Enclosures

c: Tamara Freeman, US EPA Region VII
Northeast Regional Office
PAMS File: 2004-08-046





Missouri Department of Natural Resources
Air Pollution Control Program

PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: OP 2006-023

Expiration Date:

Installation ID: 117-0012

Project Number: 2004-08-046

Installation Name and Address

Donaldson Company, Inc.
400 Donaldson Drive
Chillicothe, MO 64601
Livingston County

Parent Company's Name and Address

Donaldson Company, Inc.
PO Box 1299
Minneapolis, MN 55440-1299

Installation Description:

The installation manufactures engine air cleaners. Sheet and bar steel stock are cut and pressed into shape (SIC 34). During assembly the cleaners are welded, soldered, ground, washed, and painted in booths with powder- or solvent-based paint (SIC 34 & 17). Ovens are used to dry the washed and solvent-painted cleaners and to cure the powder-painted cleaners.

Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION:

The installation manufactures engine air cleaners. Sheet and bar steel stock are cut and pressed into shape (SIC 34). During assembly the cleaners are welded, soldered, ground, washed, and painted in booths with powder or solvent based paint (SIC 34 & 17). Ovens are used to dry the washed and solvent painted cleaners and to cure the powder painted cleaners.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAP)
2004	2.27	-	-	16.36	-	-	-
2003	1.94	0.01	2.26	23.38	0.47	-	-
2002	4.97	-	2.14	12.39	0.44	-	-
2001	4.11	0.02	3.54	15.32	0.72	-	0.20
2000	4.20	-	2.56	8.99	0.54	-	6.93

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit	EIQ Emission Point
<i>Paint Spray Booths and Welding and Grinding Stations</i>		
EU0010	Electrostatic solvent-based paint spray booth	EP-3
EU0020	Touch-up solvent-based paint spray booth	EP-4
EU0030	1 arc welding station, uncontrolled emissions	EP-11
EU0040	Grinding station, 7 arc welding stations, and 24 resistance welding stations, controlled emissions	EP-52
<i>Direct Heating Units</i>		
EU0050	Solvent paint cure oven	EP-5
EU0060	Dry off oven	EP-18
EU0070	Hook burn-off oven	EP-19
EU0080	Powder paint cure oven,	EP-25, EP-43, EP-44, EP-47
<i>Indirect Heating Units</i>		
EU0090	Conveyorized spray parts washer, stage 1	EP-13
EU0100	Conveyorized spray parts washer, stage 4	EP-14
EU0110	Boiler #1	EP-49
EU0120	Boiler #2	EP-50
EU0130	Make-up air space heater I	EP-54
EU0140	Make-up air space heater II	EP-55

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<u>Description of Emission Source</u>	<u>EIQ Emission Point</u>
<i>Discussed in Statement of Basis</i>	
Electrostatic powder paint spray booth	EP-25
1 resistance welding station, uncontrolled emissions	EP-30
3 arc welding stations and 15 resistance welding stations, controlled emissions	EP-58
Body seam sealants, fugitive emissions	EF-1
18 resistance welding stations and grinding, uncontrolled fugitive emissions	EF-2-20
1 arc welding station, uncontrolled fugitive emissions	EF-2-21
<i>Insignificant Activities Required to Be Listed</i>	
504 Paint Vault	EP-1
520 Paint Vault	EP-2
Conveyorized spray parts washer entrance	EP-12
Conveyorized spray parts washer, stage 6	EP-17
511 Tube Saw Grinding Process	EP-45
511 Plasma Cutter	EP-46
Office Heat	EP-53
Propane Tank Vents	EP-56, EP-57

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit No. 1291-006 effective date Dec. 9, 1991
- 2) Construction Permit No. 0292-002 effective date Feb. 4, 1992

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitations:

- 1) The permittee shall emit less than 9.50 tons of any single hazardous air pollutant (HAP) from all operations in any period of 12 consecutive months.
- 2) The permittee shall emit less than 24.50 tons of all hazardous air pollutants (HAP) from all operations in any period of 12 consecutive months.

Monitoring:

- 1) Each month the permittee shall calculate the amount in tons of each HAP and the amount in tons of total HAP emitted from the facility's operations for that month. The minimum data required for these calculations are:
 - a) Name identifying each HAP-containing paint, thinner, and other material used each month.
 - b) Amount in gallons of each such paint, thinner, and other material; and
 - c) Either of the following:
 - i) HAP content in pounds per gallon of each such paint, thinner, and other material or
 - ii) Material density in pounds per gallon and HAP content in pounds per pound of each such paint, thinner, or other material.
- 2) Each month the permittee shall calculate the amount in tons of each HAP and the amount in tons of total HAP emitted from the facility's operations for the most recent period of 12 consecutive months.

Recordkeeping:

- 1) Each month, the permittee shall record the amount in tons of each HAP and the amount in tons of total HAP emitted from the facility's operations for that month, and the data required to calculate these amounts.
- 2) Each month, the permittee shall record the amount in tons of each HAP and the amount in tons of total HAP emitted from the facility's operations for the most recent period of 12 consecutive months.
- 3) Attachments A1 and A2 contain logs including these record keeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 4) The permittee shall keep documentation, such as Material Safety Data Sheets or manufacturer specifications, verifying the HAP content and, if used, material density, of each HAP-containing paint, thinner, or other material used.
- 5) These records shall be maintained for five years. They must be maintained on-site for two years. They may be kept in either written or electronic form.
- 6) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any calculation of facility HAP emissions for any consecutive 12 months is:

- equal to or greater than 9.50 tons for any single HAP; or
- equal to or greater than 24.50 tons for all HAP.

PERMIT CONDITION PW002

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 99.50 tons of volatile organic compounds (VOC) from all operations in any period of 12 consecutive months.

Monitoring:

- 1) Each month the permittee shall calculate the amount in tons of VOC emitted from the facility's operations for that month and for the most recent period of 12 consecutive months. The minimum data required in these calculations are:
 - a) Name identifying each VOC-containing paint, thinner, and other material used each month.
 - b) Amount in gallons of each such paint, thinner, and other material; and
 - c) Either of the following:
 - i) VOC content in pounds per gallon of each such paint, thinner, and other material or
 - ii) Material density in pounds per gallon and VOC content in pounds per pound of each such paint, thinner, or other material.

Recordkeeping:

- 1) The permittee shall record the amount of VOC emitted from the facility's emission units for each month and the amount of VOC emitted during the most recent period of 12 consecutive months.
- 2) Attachment B contains a log including these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 3) The permittee shall keep documentation, such as Material Safety Data Sheets or manufacturer specifications, verifying the VOC content and, if used, material density, of each VOC-containing paint, thinner, or other material used.
- 4) These records shall be maintained for five years. They must be maintained on-site for two years. They may be kept in either written or electronic form.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any calculation of total facility VOC emissions for any period of 12 consecutive months is equal to or greater than 99.50 tons.

III. Emission Unit-Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 THROUGH EU0040 – PAINT SPRAY BOOTHS AND GRINDING AND WELDING STATIONS			
Emission Unit	Description	Manufacturer/Model #	2003 EIQ Reference #
EU0010	Electrostatic solvent-based paint spray booth, installed 1984	Binks	EP-3
EU0020	Touch-up solvent-based paint spray booth, installed 1984	Binks	EP-4
EU0030	1 arc welding station, uncontrolled emissions, probably installed before 1977	Unknown	EP-11
EU0040	Grinding station, 7 arc welding stations, and 24 resistance welding stations, controlled emissions, installation date unknown	Unknown, but control is a Torit Downflo Dust Collector	EP-52

PERMIT CONDITION (EU0010 THROUGH EU0040) - 001 10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

Emission Limitations:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on these emission units using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit

issuance. Should no violation of this regulation be observed during this period then –

- b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
- c) Observations must be made semi-annually. If a violation is noted, monitoring reverts to weekly. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source has already performed the weekly and biweekly monitoring and is doing monthly or semi-annual monitoring in compliance with a previous permit, the weekly and biweekly monitoring do not need to be repeated.

Record Keeping:

- 1) The permittee shall maintain records of all Method 22 observation results (See Attachment D1 or D2.), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (See Attachment E.)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment F.)
- 4) Attachments D1, D2, E, and F are forms satisfying these record keeping requirements. These forms or equivalents created by the permittee must be used to certify compliance with this requirement.
- 5) These records shall be maintained for five years. They must be maintained on-site for two years. They may be kept in either written or electronic form.
- 6) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
- 2) The permittee shall report any deviations from the monitoring, record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EU0050 THROUGH EU0080 – DIRECT HEATING UNITS			
Emission Unit	Description	Manufacturer/Model #	2003 EIQ Reference #
EU0050	Solvent paint cure oven, 5.0 MMBtu/hr, natural gas or propane fired, installed 1980	Advanced Curing Systems/ Type A	EP-5
EU0060	Dry off oven, 3.0 MMBtu/hr, natural gas or propane fired, installed 1991	Milbanks Systems/ 425WRW2A, Serial # 7505030791	EP-18
EU0070	Hook burn-off oven, 0.625 MMBtu/hr, natural gas fired, installed 1988	Pollution Control Products/ PTR112T3194	EP-19
EU0080	Powder paint cure oven, 5.0 MMBtu/hr, natural gas or propane fired, installed 1991	EP-25 and EP-47 Americraft/12 ½; EP-43 and EP-44 Twin City Blower Exhaust/ 182 BVC	EP-25, EP-43, EP-44, EP-47

PERMIT CONDITION (EU0050 THROUGH EU0080) - 001
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

Emission Limitations:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on these emission units using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
 - c) Observations must be made semi-annually. If a violation is noted, monitoring reverts to weekly.

If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source has already performed the weekly and biweekly monitoring and is doing monthly or semi-annual monitoring in compliance with a previous permit, the weekly and biweekly monitoring do not need to be repeated.

Record Keeping:

- 1) The permittee shall maintain records of all Method 22 observation results (See Attachment D1 or D2.), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (See Attachment E.)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment F.)
- 4) Attachments D1, D2, E, and F are forms satisfying these record keeping requirements. These forms or equivalents created by the permittee must be used to certify compliance with this requirement.
- 5) These records shall be maintained for five years. They must be maintained on-site for two years. They may be kept in either written or electronic form.
- 6) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
- 2) The permittee shall report any deviations from the monitoring, record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION (EU0050 THROUGH EU0080) - 002

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

Emission Limitation:

- 1) Emissions from any existing or new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation/Equipment Specifications:

The emission units shall be limited to burning pipeline grade natural gas.

Monitoring/Record Keeping:

The permittee shall maintain documentation supporting that the fuel used in these emission units is pipeline grade natural gas.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Note: The current version of 10 CSR 10-6.260 (May 30, 2004, effective date) exempts combustion equipment that exclusively uses pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, from the requirements of this rule. Therefore, when the provisions of the current version of 10 CSR 10-6.260 are incorporated into the federally approved SIP as a final EPA action, the emission units will not be subject to 10 CSR 10-6.260 and this permit condition will no longer be an applicable requirement in this operating permit.

PERMIT CONDITION EU0070 - 003
10 CSR 10-6.060 Construction Permits Required
Permit to Construct Number 0292-002

Emission Limitations:

- 1) Absolutely no plastic or Teflon parts shall be processed in the paint burn-off oven. A permit modification from the Air Pollution Control Program shall be obtained prior to any changes in the type and quantities of materials to be processed in the oven other than what is contained in the original permit application for Construction Permit 0292-002.
- 2) Operating personnel must have adequate training and knowledge of the operation of the burn-off oven. Training shall include the manufacturer's instructions and guidelines of operation.
- 3) The burn-off oven shall be operated in accordance with the manufacturer's instruction and guidelines of operation at all times.

Monitoring/Recordkeeping:

- 1) The manufacturer's instructions and guidelines of operation of the burn-off oven shall be immediately available upon verbal request of Department of Natural Resources personnel.
- 2) A copy of Construction Permit 0292-002 shall be kept at the facility and be made available immediately for inspection to Department of Natural Resources personnel upon verbal request.
- 3) The permittee shall maintain a record of employee training on operation of the burn-off oven. Attachment C contains a log including these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 4) All records shall be maintained on-site for five years, except for the manufacturer's instructions and guidelines of operation of the burn-off oven and the copy of Construction Permit 0292-002, which shall be kept on-site for as long as the paint burn-off oven is in use.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.

Reporting:

The permittee shall report to the APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any deviation from the requirements of this permit condition.

EU0090 THROUGH EU0140 – INDIRECT HEATING UNITS			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0090	Conveyorized spray parts washer, stage 1, 7.2 MMBtu/hr, natural-gas or propane fired, installed 1991	Milbanks Systems 425WRW2A, Serial # 7505030791	EP-13
EU0100	Conveyorized spray parts washer, stage 4, 4.0 MMBtu/hr, natural-gas or propane fired, installed 1991	Milbanks Systems 425WRW2A, Serial # 7505030791	EP-14
EU0110	Boiler #1, 9.8 MMBtu/hr, natural-gas or propane fired, installed 1977	Kewanee Boiler Corp.	EP-49
EU0120	Boiler #2, 9.8 MMBtu/hr, natural-gas or propane fired, installed 1977	Kewanee Boiler Corp.	EP-50
EU0130	Make-up air space heater I, 5.5 MMBtu/hr, natural gas fired, installed 1991	Weather Rite & Rheem Manuf.	EP-54
EU0140	Make-up air space heater II, 5.5 MMBtu/hr, natural gas fired, installed 1972	Weather Rite & Rheem Manuf.	EP-55

PERMIT CONDITION (EU0090 THROUGH EU0140) - 001
10 CSR 10-3.060, Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitations:

- 1) The permittee shall not emit particulate matter from conveyorized spray parts washer, stage 1 (EU0090) in excess of 2.7 pounds per hour (0.37 lb/MMBtu).
- 2) The permittee shall not emit particulate matter from conveyorized spray parts washer, stage 4 (EU0100) in excess of 1.5 pounds per hour (0.37 lb/MMBtu).
- 3) The permittee shall not emit particulate matter from boiler #1 (EU0110) in excess of 4.6 pounds per hour (0.47 lb/MMBtu).
- 4) The permittee shall not emit particulate matter from boiler #2 (EU0120) in excess of 4.6 pounds per hour (0.47 lb/MMBtu).
- 5) The permittee shall not emit particulate matter from make-up air space heater I (EU0130) in excess of 2.0 pounds per hour (0.37 lb/MMBtu)
- 6) The permittee shall not emit particulate matter from make-up air space heater II (EU0140) in excess of 2.6 pounds per hour (0.47 lb/MMBtu).

Operational Limitation

These emission units shall be limited to burning pipeline grade natural gas or liquefied petroleum gas or any combination of these fuels.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain documentation supporting that the fuel used in these emission units is pipeline grade natural gas or liquefied petroleum gas or any combination of these fuels.

- 2) The permittee will be in compliance with this regulation as long these emission units burn only pipeline grade natural gas or liquefied petroleum gas or any combination of these fuels. Calculations demonstrating this are in Attachments G and H. The permittee shall keep Attachments G and H with this permit.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.(II).

PERMIT CONDITION (EU0090 THROUGH EU0140) - 002

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

Emission Limitations:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Operational Limitation

This emission unit shall be limited to burning pipeline grade natural gas or liquefied petroleum gas or any combination of these fuels.

Monitoring/Recordkeeping/Reporting:

The monitoring, recordkeeping, and reporting required to demonstrate compliance with Permit Condition (EU0090 THROUGH EU0140) - 001 also suffices to demonstrate compliance with this permit condition. No additional monitoring, recordkeeping, or reporting is required for this permit condition.

PERMIT CONDITION (EU0090 THROUGH EU0140) - 003

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

Emission Limitation:

No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period

Operational/Equipment Limitation:

These emission units shall be limited to burning pipeline grade natural gas or liquefied petroleum gas or any combination of these fuels.

Monitoring/Recordkeeping/Reporting:

The monitoring, recordkeeping, and reporting required to demonstrate compliance with Permit Condition (EU0090 THROUGH EU0140) - 001 also suffices to demonstrate compliance with this

permit condition. No additional monitoring, recordkeeping, or reporting is required for this permit condition.

Note: The current version of 10 CSR 10-6.260 (May 30, 2004, effective date) exempts combustion equipment that exclusively uses pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, from the requirements of this rule. Therefore, when the provisions of the current version of 10 CSR 10-6.260 are incorporated into the federally approved SIP as a final EPA action, the emission units will not be subject to 10 CSR 10-6.260 and this permit condition will no longer be an applicable requirement in this operating permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions
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- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-3.030 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Donaldson Company, Inc. from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one (1) volume of odorous air is diluted with seven (7) volumes of odor-free air for two (2) separate trials not less than fifteen (15) minutes apart within the period of one (1) hour. **This requirement is not federally enforceable.**

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage
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| <ol style="list-style-type: none">1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:<ol style="list-style-type: none">a) Monitoring methods outlined in 40 CFR Part 64;b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; andc) Any other monitoring methods approved by the director.2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:<ol style="list-style-type: none">a) Monitoring methods outlined in 40 CFR Part 64;b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; andc) Compliance test methods specified in the rule cited as the authority for the emission limitations.3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:<ol style="list-style-type: none">a) Applicable monitoring or testing methods, cited in:<ol style="list-style-type: none">i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";ii) 10 CSR 10-6.040, "Reference Methods";iii) 10 CSR 10-6.070, "New Source Performance Standards";iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; orb) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above. |
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V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)
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The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements
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- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios
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None.

10 CSR 10-6.065, §(5)(C)1, §(5)(C)3, and §(6)(C)3 Compliance Requirements
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- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Roy Crawley. In July 2005, the Air Pollution Control Program was informed that **Charles Dill** is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations,

agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

For HAP Name: _____ CAS No.: _____

Company Name: Donaldson Co. Inc.
Facility Location: 400 Donaldson Drive, Chillicothe, MO 64601 Livingston County Facility ID: 117-0012

- 1 Duplicate and fill out this form each month for each HAP emitted. If more than twelve different solvent-based paints and thinners containing a specific HAP were used in one month, use more than one sheet for that HAP for that month and fill out total lines only on the last of these multiple sheets.
- 2 Maintain documentation, such as Material Safety Data Sheets or manufacturer specifications, verifying material density and HAP content. Assume that 100% of HAP evaporates to the air. If Column D is in lb/gal, then Column C is not needed
- 3 If Column D is in lb/gal then Column E = Column B X Column D X 0.0005
If Column D is in lb/lb, then Column E = Column B X Column C X Column D X 0.0005
- 4 Month Total = total of all Column E entries for this month and HAP
- 5 Running 12-Month Total = Total line above + Total lines from previous 11 months' tracking records for this HAP

If “Running 12-Month Total” is not more than 9.50 tons for any HAP emitted, then installation is in compliance with the first emission limitation of Permit Condition PW001.

Attachment A2
Monthly Combined HAP Emissions Tracking Record
For month of _____, year of _____¹

Company Name: Donaldson Co. Inc.

Facility Location: 400 Donaldson Drive, Chillicothe, MO 64601

Livingston County

Facility ID: 117-0012

Column A HAP Name ²	Column B CAS No. ²	Column C Running 12-Month Total ³ (tons)
Combined Running 12-Month Total ⁴		

- 1 Duplicate and fill out this form each month. If more than twelve different HAP are emitted in one month, use more than one sheet for that month and fill out total line only on the last of these multiple sheets.
- 2 Copy from heading of one Monthly Individual HAP Emissions Tracking Record for this month and year. There will be one row on this form for each Monthly Individual HAP Emissions Tracking Record for this month and year.
- 3 Copy from "Running 12-Month Total" on the same Monthly Individual HAP Emissions Tracking Record as in 2 above.
- 4 Combined Running 12-Month Total = total of all figures in Column C

If “Combined Running 12-Month Total” is not more than 24.50 tons, then installation is in compliance with the second emission limitation of Permit Condition PW001.

Attachment B
Monthly VOC Emissions Tracking Record

For month of _____, year of _____¹

Company Name: Donaldson Co. Inc.

Facility Location: 400 Donaldson Drive, Chillicothe, MO 64601

Livingston County

Facility ID: 117-0012

Column A Name of VOC-containing Paint, Thinner, or Other Material	Column B Amount Used Plant Wide (gal)	Column C ² Material Density (lb/gal)	Column D ² VOC Content (lb/gal or lb/lb)	Column E ³ Monthly VOC Emissions (tons)
Month Total ⁴				
Running 12- Month Total ⁵				

1 Duplicate and fill out this form each month. If more than ten different solvent-based paints and thinners are used in one month, use more than one sheet for that month and fill out total line only on the last of these multiple sheets.

2 Maintain documentation, such as Material Safety Data Sheets or manufacturer's specifications, verifying material density and VOC content. Assume that 100% of VOC evaporates to the air. If Column D is in lb/gal, then Column C is not needed

3 If Column D is in lb/gal then Column E = Column B X Column D X 0.0005

If Column D is in lb/lb, then Column E = Column B X Column C X Column D X 0.0005

4 Month Total = total of all Column E entries for this month

5 Running 12-Month Total = Total line above + Total lines from previous 11 months' tracking records for VOC

If "Running 12-Month Total" is not more than 99.50 tons, then installation is in compliance with the second emission limitation of Permit Condition PW002.

Attachment C

Log of Employee Training on Burn-Off Oven Operation

Donaldson Co., Installation No. 117-0012

[illegible]

Attachment D1
Example Form for Recording Method 22 Observations

[illegible]

Attachment D2

Method 22 (Outdoor Observation Log)		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.		
Observation Clock Time	Observation Period Duration (minute:second)	Accumulative Emission Time (minute:second)
Begin Observation		
End Observation		

Attachment E

Inspection/Maintenance/Repair/Malfunction Log

[illegible]

Attachment F

Method 9 Opacity Emission Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Min.	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
YES NO Signature of Observer _____

Attachment G

This attachment may be used to demonstrate that emission units EU0110, EU0120, and EU0140 are in compliance with Permit Condition (EU0090 THROUGH EU0140) - 001, which contains the requirements of regulation 10 CSR 3.060, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*.

The PM emission limit in this regulation is based on the total heat input ratings, in MMBtu/hr, of all indirect heating units at the installation and on whether the emission units are existing or new. The indirect heating sources at the plant are listed below.

conveyorized spray parts washer stages 1 and 4 (EU0090 and EU0100), 11.2 MMBtu/hr total

boilers 1 and 2 (EU0110 and EU0120), 9.8 MMBtu/hr each

make-up air space heaters I and II (EU0130 and EU0140), 5.5 MMBtu each

The sum of their heat input ratings is $Q = [2 \times 9.8 + 11.2 + 2 \times 5.5] \text{MMBtu/hr} = 41.8 \text{ MMBtu/hr}$

The boilers (EU0110 and EU0120) and the make-up air space heater II (EU0140) were installed by February 15, 1979, so they are existing for the purposes of this regulation.

10 CSR 10-3.060(4)(B) contains an equation for determining the applicable PM emission limit for existing indirect heating sources at an installation when the total heat input for indirect sources is between 10 MMBtu/hr and 10,000 MMBtu/hr:

$$E = 0.90(Q)^{-0.174} = 0.90(41.8)^{-0.174} = 0.47 \text{ lb/MMBtu}$$

where

E = maximum allowable emission rate in pounds per million Btu of heat input, rounded off to two decimal places, and

Q = installation heat input in millions of Btu per hour.

Table 1.4.2 in U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, gives the PM emission factor for natural gas combustion as 7.6 pounds per 10^6 ft^3 . Note a on Table 1.5.1 in the same document indicates that emissions (except SOx and NOx) for propane combustion are the same, on a heat input basis, as for natural gas combustion. The potential PM emissions for these emission units are calculated using the AP-42 emission factor and fuel heat content for natural gas combustion.

$$\begin{aligned} \text{Potential PM emission rate} &= 7.6 \text{ lb PM}/10^6 \text{ scf} \times \text{scf}/1020 \text{ Btu} \times 10^6 \text{ Btu/MMBtu} \\ &= 0.007 \text{ lb/MMBtu} \end{aligned}$$

The potential PM emission rate is less than 2 percent of the emission limit. Therefore these emission units will be in compliance as long as they burn natural gas or liquefied petroleum gas.

Attachment H

This attachment may be used to demonstrate that emission units EU0090, EU0100, and EU0130 are in compliance with Permit Condition (EU0090 THROUGH EU0140) - 001, which contains the requirements of regulation 10 CSR 3.060, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*.

The PM emission limit in this regulation is based on the total heat input ratings, in MMBtu/hr, of all indirect heating units at the installation and on whether the emission units are existing or new. The indirect heating sources at the plant are listed below.

conveyorized spray parts washer stages 1 and 4 (EU0090 and EU0100), 11.2 MMBtu/hr total

boilers 1 and 2 (EU0110 and EU0120, EP-49 and EP-50), 9.8 MMBtu/hr each

make-up air space heaters I and II (EU0130 and EU0140), 5.5 MMBtu each

The sum of their heat input ratings is $Q = [2 \times 9.8 + 11.2 + 2 \times 5.5] \text{ MMBtu/hr} = 41.8 \text{ MMBtu/hr}$

The conveyorized spray parts washer stages 1 and 4 (EU0090 and EU0100) and the make-up air space heater I (EU0130) were installed after February 15, 1979, so they are new for the purposes of this regulation.

10 CSR 10-3.060(5)(B) contains an equation for determining the applicable PM emission limit for new indirect heating sources at an installation when the total heat input for indirect sources is between 10 MMBtu/hr and 10,000 MMBtu/hr:

$$E = 1.31(Q)^{-0.338} = 1.31(41.8)^{-0.338} = 0.37 \text{ lb/MMBtu}$$

where

E = maximum allowable emission rate in pounds per million Btu of heat input, rounded off to two decimal places, and

Q = installation heat input in millions of Btu per hour.

Table 1.4.2 in U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, gives the PM emission factor for natural gas combustion as 7.6 pounds per 10^6 ft^3 . Note a on Table 1.5.1 in the same document indicates that emissions (except SO_x and NO_x) for propane combustion are the same, on a heat input basis, as for natural gas combustion. The potential PM emissions for these Emission units are calculated using the AP-42 emission factor and fuel heat content for natural gas combustion.

$$\begin{aligned} \text{Potential PM emission rate} &= 7.6 \text{ lb PM}/10^6 \text{ scf} \times \text{scf}/1020 \text{ Btu} \times 10^6 \text{ Btu/MMBtu} \\ &= 0.007 \text{ lb/MMBtu} \end{aligned}$$

The potential PM emission rate is less than 2 percent of the emission limits. Therefore these emission units will be in compliance as long as they burn natural gas or liquefied petroleum gas.

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, signed on August 10, 2004.
- 2) 2004 Emissions Inventory Questionnaire, received March 17, 2005;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*, was not checked on the application nor included in the previous permit. It does not apply to the direct heating units (EU0050 through EU0080) because all they are used for direct, rather than indirect, heating. It does apply to the indirect heating units (EU0090 through EU0140.) However, they are automatically in compliance with it as long as they burn natural gas or liquefied petroleum gas. This regulation is included in this permit, but only for the purpose of restricting the indirect heating units to burning natural gas or liquefied petroleum gas.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

- 1) 10 CSR 10-3.050, *Restriction of Emission of Particulate Matter from Industrial Processes*, is not included in this operating permit even though it was included in the previous one, because it was rescinded on March 30, 2001. It was replaced by 10 CSR 10-6.400. (See item 3 below.)
- 2) 10 CSR 10-6.220, *Restriction of Emissions of Visible Air Contaminants*, applies to the indirect heating units (EU0090 through EU0140.) However, they are automatically in compliance with it as long as they burn natural gas or liquefied petroleum gas. Section 1.5.3.1 in U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, states that liquefied petroleum gas does not produce visible emissions, even though it

does produce a small amount of particulate matter. The same is true for natural gas. (See note (a) on Table 1.5.1 in that same document.). Therefore this regulation is included as a permit condition for these emission units, but the only monitoring, recordkeeping, and reporting requirements for them are to demonstrate that they burn those fuels exclusively.

10 CSR 10-6.220 is not included in this permit for the following emission units for the reasons given.

- a) The electrostatic powder paint spray booth (EP-25) has such low potential PM emissions (See item 3) j) below.) that it is reasonable to expect that it will never reach a 20% opacity limit.
 - b) The same is true for the 1 resistance welding station, uncontrolled emissions (EP-30.) (See item 3) k) below.)
 - c) The 3 arc welding stations and 15 resistance welding stations, controlled emissions (EP-58) are controlled by a Torit T-2000. The Torit T-2000 is self-contained and vents back into the plant. Any pollutants left will eventually go through the main Torit (Ep-52.)
 - d) The body seam sealants, fugitive emissions (EF-1) do not contain any PM.
 - e) The 18 resistance welding stations and grinding, uncontrolled fugitive emissions (EF-2-20) are released inside the plant. Any pollutants left will eventually go through the main Torit (Ep-52.)
 - f) The same is true for the 1 arc welding station, uncontrolled fugitive emissions (EF-2-21.)
- 3) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*, does not apply to fugitive emissions, to the burning of fuel for indirect heating, nor to emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pound per hour of particulate matter. As shown below, no emission units at this installation are subject to this regulation. When no other regulations apply to an emission unit either, it is listed in this permit as “emission units without limitations.”
- a) Electrostatic solvent-based paint spray booth and touch-up solvent-based paint spray booth
These two paint spray booths (EU0010 and EU0020) each have an MHDR of 3 gallons of solvent-based paint per hour, with a transfer efficiency of 40%. For the paints used, the average density is 8.99 lb/gal, and the average VOC content is 5.21 lb/gal, giving a solids content of 3.78 lb/gal. A filter with a capture efficiency of 99% and a control efficiency of 96% controls exhaust emissions. Calculating each booth’s potential to emit PM gives:
$$3 \text{ gal/hr} \times 3.78 \text{ lb/gal} \times (1 - 0.4) \times (1 - [0.99 \times 0.96]) = 0.34 \text{ lb/hr} < 0.5 \text{ lb/hr}$$
 - b) Solvent paint cure oven
This oven (EU0050) has an MHDR of 2.5 MMBtu/hr and is natural gas- or propane-fired. The fuel burned is the only source of PM here. Table 1.4.2 in U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, gives the PM emission factor for natural gas combustion as 7.6 pounds per 10^6 ft^3 . Note a on Table 1.5.1 in the same document indicates that emissions (except SO_x and NO_x) for

propane combustion are the same, on a heat input basis, as for natural gas combustion. There are 1,020 Btu in a standard cubic of natural gas. Calculating the unit's potential to emit PM gives:

$$7.6 \text{ lb}/10^6 \text{ ft}^3 \times \text{ft}^3/1020 \text{ Btu} \times 2.5 \times 10^6 \text{ Btu/hr} = 0.02 \text{ lb/hr} \ll 0.5 \text{ lb/hr}$$

c) Dry off oven

This oven (EU0060) has an MHDR of 3.0 MMBtu/hr and is natural gas- or propane-fired. As for d) above, the fuel burned is the only source of PM, and the PM emission factor for natural gas is 7.6 lb/10⁶scf. There are 1,020 Btu in a standard cubic of natural gas. Calculating the unit's potential to emit PM gives:

$$7.6 \text{ lb}/10^6 \text{ ft}^3 \times \text{ft}^3/1020 \text{ Btu} \times 3.0 \times 10^6 \text{ Btu/hr} = 0.02 \text{ lb/hr} \ll 0.5 \text{ lb/hr}$$

d) Hook burn-off oven

Hooks are used to hold parts as they are being painted, and paint gets on the hooks in the process. The hooks are put through this natural gas fired hook burn-off oven (EU0070) to remove this paint so they can be reused. 10 CSR 10-6.400 (2)(A) excludes liquids and gases used for fuel from the process weight, so the natural gas does not need to be considered further here, just the paint burned off the hooks. The current application gives a PM emission rate, but this may be only for the natural gas, which is irrelevant here, and not for the burned-off paint. The previous operating permit was for an Ace Model 240 oven, and the current oven is a Pollution Control Products Model PTR112T3194. This manufacturer gave the PM emission rate of this model as 0.0133 pound per hour. Further, they state that the rate does not vary with the amount of paint on the hooks loaded; the furnace runs longer the larger the load while maintaining the same emission rate. This emission rate is much less than 0.5 lb/hr.

e) Powder paint cure oven

This oven (EU0080) has an MHDR of 5.0 MMBtu/hr and is natural gas- or propane-fired. As for d) above, the fuel burned is the only source of PM, and the PM emission factor for natural gas is 7.6 lb/10⁶scf. There are 1,020 Btu in a standard cubic of natural gas. Calculating the unit's potential to emit PM gives:

$$7.6 \text{ lb}/10^6 \text{ ft}^3 \times \text{ft}^3/1020 \text{ Btu} \times 5.0 \times 10^6 \text{ Btu/hr} = 0.04 \text{ lb/hr} \ll 0.5 \text{ lb/hr}$$

f) Conveyorized spray parts washer, stage 1 and conveyorized spray parts washer, stage 4

These spray parts washer stages (EU0090 and EU0100) burn fuel for indirect heating.

g) Boiler #1 and Boiler #2

These two boilers (EU0110 and EU0120) burn fuel for indirect heating.

h) Make-up air space heater I and make-up air space heater II

These heaters (EU0130 and EU0140) burn fuel for indirect heating

i) Arc Welding Operations

The table below presents inputs and the results of calculations of the potential PM emissions from each arc welding emission point.

Column F = $C \times D \times E / 1000$ and Column H = $F \times (1-G)$

A	B	C	D	E	F	G	H
EQ Emission Point	Number of Stations	MHDR (pieces / hr)	Weight (lb rod / piece)	Emission Factor (lb PM / 1000 lb rod)	Uncontrolled PM Emissions (lb/hr)	Capture and Control Efficiencies	PM PTE (lb/hr)
EP-11	1	10	2	5.2	0.10	0 × 0	0.10
EP-52	7	70	2	5.2	0.73	.9999 × .9999	0.00015
EP-58	3	30	2	5.2	0.31	.60 × .99	0.13
EF-2-21	1	10	2	5.2	0.10	.999	0.0001

Note 1: EP-52 and EP-58 are controlled. EP-11 is not. EF-2-21 releases fugitive emissions inside the plant, and pollutants which do not stay there will eventually go through the main Torit (EP-52.)

The results in Column H are all < 0.5 lb/hr.

j) Electrostatic powder paint spray booth

This paint spray booth (EP-25) has the potential to apply 486 pounds of powder paint per hour with a transfer efficiency of 50 percent. For the powder paints used, the solids content is 99.87% by weight, giving a solids content of 0.9987 lb/lb. Two filters control exhaust emissions. A Torit filter with a capture efficiency of 99.99% and a control efficiency of 99.99% is followed by a HEPA filter with a capture efficiency of 100% and a control efficiency of 99.999%. Calculating the booth's potential to emit PM gives:

$$486 \text{ lb/hr} \times 0.9987 \text{ lb/lb} \times (1 - 0.5) \times (1 - [0.9999 \times 0.9999]) \times (1 - [1.00 \times 0.99999]) = < 4.85 \times 10^{-7} \text{ lb/hr} < 0.5 \text{ lb/hr}$$

k) Resistance Welding Operations

The table below presents inputs and results of calculations of the potential PM emissions from each resistance welding emission point.

Column E = $C \times D$ and Column G = $E \times (1-F)$

A	B	C	D ¹	E	F	G
EQ Emission Point	Number of Stations	MHDR (pieces / hr)	Emission Factor (lb PM / piece)	Uncontrolled PM Emission (lb PM / hr)	Capture and Control Efficiencies	PM PTE (lb/hr)
EP-30	1	10	0.0004	0.004	0 × 0	0.004000
EP-52	24	240	0.0004	0.096	.9999 × .9999	0.000019
EP-58	15	150	0.0004	0.060	.999 × .9999	0.000066
EF-2-20	18	180	0.0004	0.072	.999	0.000072

Note 1: Resistance welding inherently has very low-emissions. The permittee conducted an indoor air monitoring study to estimate the amount of PM released by similar resistance welding stations at another plant. The result, submitted by the permittee in the Operating Permit application, is shown in the table in column D.

Note 2: EP-52 and EP-58 are controlled. EP-30 and, of course, EF-2-20 (fugitive) are not. The results in Column G are all << 0.5 lb/hr.

l) Grinding station, controlled emissions

This grinding station (EP-52) has an MHDR of 400 pieces/hr and an emission factor of 1.5 lb/piece. Exhaust is controlled by a downflow dust collector with a capture efficiency of 99.99% and a control efficiency of 99.99%. Calculating the station's potential to emit PM gives:
 $400 \text{ pieces/hr} \times 1.5 \text{ lb/piece} \times (1 - [0.9999 \times 0.9999]) = 0.12 \text{ lb/hr} < 0.5 \text{ lb/hr}$

m) Body seam sealants, fugitive emissions

These emissions (EF-1) are not only, as indicated in their description, fugitive, but they contain only VOC and no PM.

n) Fugitive emissions from grinding

These emissions (EF-2-20) are, as indicated in their description, fugitive.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

Construction Permit No. 1099-020 was issued to Donaldson Company Inc. on October 18, 1999. The permittee never used it, and the product line for which the equipment was permitted is no longer at the facility. Therefore this construction permit is not incorporated into this operating permit.

New Source Performance Standards Applicability

- 1) 40 CFR Part 60 Subpart D, *Standards of Performance for Fossil Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971*, does not apply to the boilers (EU0110 and EU0120). Per §60.40(a)(2), only units with a heat input rate greater than 250 MMBtu are subject to this regulation, and these boilers have heat input rates of only 9.8 MMBtu each. Similarly, Subparts Da and Db do not apply, because of the boilers' small heat input rate. Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, does not apply either. Per §60.40c(a), only units constructed after June 9, 1989 are subject to this regulation, and these boilers date from 1977. These regulations are not applicable to any other emission units at this installation. The indirect heating units (EU0050, through EU0080) and heaters (EU0130 and EU0140) all generate hot air rather than steam. The spray parts washer stages 1 and 4 (EU0090 and EU0100) only heat, rather than boil, the water.
- 2) 40 CFR Part 60 Subpart DDDD, *Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units That Commenced Construction On or Before November 30, 1999*, does not apply to the paint hook burn-off oven (EU0070). Per §60.2555(k), rack, part, and drum reclamation units are exempted from this regulation.

No other NSPS apply to this installation.

Maximum Available Control Technology Applicability

No MACT regulations apply to this installation. MACT regulations apply only to installations that emit hazardous air pollutants (HAP) in amounts defined as “major” by 40 CFR Part 63. HAP emission rates at this installation are limited to less than major amounts.

National Emission Standards for Hazardous Air Pollutants Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

No other National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation.

Other Regulatory Determinations

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*, does not apply to any of the direct or indirect heating units (EU0050 through EU0140) as long as they burn only pipeline grade natural gas or liquefied petroleum gas. This exemption is not in the State Implementation Plan (SIP) yet. However, as long as an emission unit burns exclusively pipeline grade natural gas or liquefied petroleum gas or any combination of these fuels, its emission rate for sulfur compounds will be in compliance with the SIP limitations. Therefore this regulation is included as a permit condition, but the only monitoring, recordkeeping, and reporting requirements are to demonstrate that these emission units burn those fuels exclusively.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

Original Signed by Cheryl Steffan

Cheryl Steffan
Environmental Engineer